

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HELEN MEIMARIS AS EXECUTRIX and LEGAL REPRESENTATIVE OF THE ESTATE OF ALKIVIADES MEIMARIS AND HELEN MEIMARIS, Plaintiffs, -against- JOSEPH E. ROYCE, LAWRENCE A. BLATTE, TULIO PRIETO , JAIME LEROUX, TBS Shipping Services Inc., Guardian Navigation , Services Inc., Gruposedei and Tecnisea, Defendants.	X)	1:18-cv-4363 (GBD)(BCM) <u>SUPPLEMENTAL AFFIRMATION TO ALKISTIS G. MEIMARIS' AFFIRMATIONS (ECF No's. 80, 82, & 84) IN OPPOSITION TO DEFENDANTS' ROYCE, BLATTE, PRIETO, TBS SHIPPING SERVICES GUARDIAN NAVIGATION MOTIONS TO DISMISS PLAINTIFFS THIRD AMENDED COMPLAINT AND IN OPPOSITION TO STAY DISCOVERY (Exhibits 7 & 8)</u>
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I, ALKISTIS G. MEIMARIS, an Attorney duly admitted to practice before this Court, hereby affirms under penalty of perjury, the following is true and correct:

1. I am the Attorney of record for the Plaintiffs, Helen Meimaris as Legal Representative and Executrix of the Estate of Alkiviades Meimaris and Helen Meimaris.

2. I am fully familiar with the facts set forth herein, and make this Affirmation in Opposition to Company Defendants, TBS Shipping Services and Guardian Navigation, Motion to Dismiss Plaintiffs' Third Amended Complaint and motion to stay discovery.

3. Attached as Exhibit 7, hereto is a true and correct copy of the corporate structure and shareholding's of TBS Commercial Group.

4. Attached as Exhibit 8, hereto is a true and correct copy of the closing date of the Bankruptcy Reorganization case dated June 29, 2012.

5. Wherefore, in light of all of the evidentiary documentation against the Defendants, it is respectfully requested for the reasons set forth in the accompanying Memorandum of Law, that Company Defendants, TBS Shipping and Guardian Navigation, motion to dismiss Plaintiffs' Third Amended Complaint should be denied and discovery should be compelled.

6. I declare under penalty of perjury, that the foregoing is true and correct.

/s/ Alkistis G. Meimaris
ALKISTIS G. MEIMARIS

Dated: October 19, 2018

cc: Counsel of record, via ECF